

FREEDMAN AND LORRY, P.C.
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

RICHARD WEINLEIN
401 Yorktown Drive
Boothwyn, PA 19061

vs.

ANAPA SHIPPING LIMITED
80 Broad Street
Monrovia, Liberia

: CIVIL ACTION
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: NO.
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COMPLAINT

JURY TRIAL DEMANDED

1. Plaintiff Richard Weinlein is a citizen and resident of the Commonwealth of Pennsylvania residing at 401 Yorktown Drive, Boothwyn, PA 19061.

2. Defendant Anapa Shipping Limited is a corporation organized and existing under the laws of Liberia with its primary place of business located at 80 Broad Street, Monrovia, Liberia.

3. The jurisdiction of this Court is invoked under 28 U.S.C., §1332, there being diversity of citizenship between the parties and the amount in controversy, exclusive of interest and costs, being in excess of Seventy Five Thousand Dollars (\$75,000.00).

4. Venue is appropriate in this Court since a substantial part of the events giving rise to the claim occurred in this Judicial District.

5. On or about October 28, 2011, and at all times material hereto, Defendant Anapa Shipping Limited, owned, managed, operated, possessed and controlled the M/V Anapa.

6. On or about October 28, 2011, the M/V Anapa was in navigable waters of the United States and was berthed at the Camden Marine Terminal in the Port of Camden, New Jersey.

7. On or about October 28, 2011, the Plaintiff Richard Weinlein was employed by Delaware River Stevedores in the capacity of longshoreman.

8. On or about October 28, 2011, at approximately 1:00 p.m., the Plaintiff Richard Weinlein was in the course and scope of his employment and was climbing a ladder inside the housing of a crane aboard the M/V Anapa when he was caused to stretch and twist his left knee, and to sustain the injuries described herein.

9. The injuries sustained by Plaintiff Richard Weinlein on or about October 28, 2011, as set forth below, were caused by the carelessness and negligence of Defendant Anapa Shipping Limited, acting through its agents, servants, workmen and employees, including the breach by said Defendant of its “turnover”, “intervention” and “active operations/active control duties” to the Plaintiff under Section 5(b) of the Longshore and Harbor Workers’ Compensation Act, 33 U.S.C. Section 905(b).

10. By reason of the carelessness and the negligence of the Defendant as aforesaid, Plaintiff was caused to sustain serious injuries to his left knee including, but not limited to, a torn medial meniscus, synovitis and aggravation and exacerbation of pre-existing degenerative

joint disease, the full extent of which has not yet been determined, he sustained other orthopedic, neurological and internal injuries; he sustained arthritic and vascular changes; he sustained severe shock and injury to his nerves and nervous system; he has in the past required and may in the future continue to require medicines, medical care and attention; he has in the past been and may in the future be compelled to expend monies and incur obligations for such care and attention; he has in the past suffered and may in the future continue to suffer agonizing aches, pains and mental anguish; he has in the past been and may in the future continue to be disabled from performing his usual duties, occupations and avocations.

WHEREFORE, Plaintiff Richard Weinlein prays that judgment be entered against Defendant Anapa Shipping Limited, for a sum in excess of Seventy Five Thousand Dollars (\$75,000.00) in damages together with costs and interest and brings this action to recover same.

FREEDMAN & LORRY, P.C

BY: /S/Scott A. Portner
SCOTT A. PORTNER
Attorney for Plaintiff

Date: July 16, 2012